



COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

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Fernando Berton
California Integrated Waste Management Board
1001 I Street
P.O. Box 4025, MS-15
Sacramento, CA 95812-4025

Dear Mr. Berton:

Draft Conversion Technologies Report to the Legislature, February 2005

The County Sanitation Districts of Los Angeles County (Sanitation Districts) is committed to providing cost effective and environmentally sound solid waste management services. Currently, the Sanitation Districts provide these services for approximately 5.1 million people in Los Angeles County. The Sanitation Districts have participated extensively at the local, state, and federal levels to assist in the establishment of the current high standards for the waste management industry, and have helped pioneer new and innovative methods for processing and disposing of waste, in support of an integrated approach to solid waste management. In an effort to find alternatives to landfilling, the Sanitation Districts developed the Commerce Refuse-to-Energy facility which established operating standards for waste-to-energy facilities in California. This facility, designed in 1984, was instrumental in establishing the New Source Performance Standards (NSPS) adopted by the US EPA. Shortly thereafter, the Sanitation Districts worked with the City of Long Beach to develop the Southeast Resource Recovery Facility (SERRF). Today, almost twenty years later, these facilities remain as examples of innovative and cost-effective waste management alternatives.

AB 2770 required the California Integrated Waste Management Board (CIWMB) to submit a report to the Legislature on new and emerging conversion technologies (CT). This report must include a comparison of the life-cycle environmental and public health impacts of conversion technologies to transformation and disposal of solid waste. The draft report to the Legislature, which is the subject of this letter, relies on the information and conclusions drawn from the *Lifecycle and Market Impact Assessment of Noncombustion Conversion Technologies* report. Upon review of the report, the Sanitation Districts quickly discovered that the findings and conclusions in the report are not applicable to the solid waste management practices of California. In particular, the report compares a conversion technology scenario against six alternatives that are not practiced in California. The authors should have chosen scenarios indicative of the reality of current standard practices in California. The authors compare CT to landfills and refuse-to-energy facilities (RTE) in the absence of predisposal recycling, and to landfills without gas collection or energy recovery. The resulting implication is that present operating practices are somehow unsound. However, the state of California has expended considerable effort developing an integrated waste management system built on diversion and recycling prior to final disposal. The normal practice for landfills over the past 20 years is landfill gas collection followed by energy recovery. The Sanitation Districts believe that the intent of the legislature, in the passage of AB 2770, was to see how conversion technologies compare to existing waste management practices in California.

In addition to making a comparison of CT with non-representative waste management scenarios, the draft report acknowledges that the data obtained on conversion technologies were not complete enough to fully assess public health impacts. It also recognizes that when evaluating the environmental impacts of conversion technologies, the report relies on data provided by vendors that was not independently verified. The Sanitation Districts have extensive first hand knowledge of landfill and refuse-to-energy facility operations and continually evaluate promising new waste management technologies. Having current operating data on local solid waste management alternatives allows the Sanitation Districts to provide a straightforward and accurate response to the intent of AB 2770. The "real world" California scenario is to start with the "residual" waste from a MRF, and determine how conversion technologies compare to landfills and RTE. These comparisons should be made for a 2010 to 2015 time period because thermal conversion facilities do not exist today in California and will not exist to any degree for another five to ten years. Comparisons based on today (2003 in the case of the lifecycle analysis report) are simply not relevant. In the future, California will see dramatic changes such as low sulfur diesel fuel, low emission diesel engines, and advanced combustion devices that will dramatically change the solid waste management environment. In addition, any comparison between conversion technologies and landfills and RTE should consider the following:

- The net power production from landfills with energy recovery is significant, approaching 70% of the electricity per ton of RTE and thermal conversion technologies.
- Landfills sequester carbon dioxide whereas RTE and CT produce carbon dioxide.
- NOx emissions are very low for landfills and CT with RTE relatively higher.

The Sanitation Districts fully support the study and demonstration of conversion technology facilities in California. The Sanitation Districts currently participate on a regional Alternative Technology Advisory Subcommittee, under the auspices of the County of Los Angeles Solid Waste Task Force, which is studying alternative technologies with the goal of implementing a pilot scale demonstration project that will provide a realistic comparison between CT and existing disposal methods.

The draft report is premature in concluding that "conversion technologies have many advantages over landfilling, composting, transformation, and recycling..." in regard to California solid waste management practices. Reporting to the Legislature that conversion technologies have many advantages based on the inappropriate assumptions and unsubstantiated conclusions of the study contained in the life-cycle and market impact analyses report would be misleading and a disservice to the people of California. The Sanitation Districts recommends that the CIWMB prepare an accurate and realistic study and evaluation of new and innovative conversion technologies that can help to advance the environmentally sound and cost-effective management of solid waste.

The Sanitation Districts stand ready to assist the Board staff in the further development of this work. If you have any questions regarding this report, please contact the undersigned at the above listed telephone number, extension 2428.

Very truly yours,
James F. Stahl



Ed J. Wheless
Division Engineer
Solid Waste Management Department